1 Chad C. Butterfield, Esq. Nevada Bar No. 010532 2 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP 300 South Fourth Street, 11th Floor 3 Las Vegas, Nevada 89101 (702) 727-1400; FAX (702) 727-1401 chad.butterfield@wilsonelser.com 4 Attorneys for Defendant Allied World Insurance Company 5 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 JOYCE SIRIANNI, Case No: 2:20-cv-00118-KJD-EJY 9 Plaintiff. STIPULATION AND [PROPOSED] ORDER 10 FOR EXTENSION OF TIME TO FILE **RESPONSIVE PLEADING TO** 11 ALLIED WORLD INSURANCE COMPANY, PLAINTIFF'S COMPLAINT DEMETRIOS A. DALACAS, ESQ., 12 individually, DEMETRIOS A. DALACAS, (First Request) ESQ., P.C., a Nevada professional corporation; 13 DOES I through X; and ROE BUSINESS ENTITIES I through X; inclusive, 14 Defendants. 15 16 Defendant ALLIED WORLD INSURANCE COMPANY ("Allied World") and Plaintiff 17 Joyce Sirianni, by and through their respective counsel of record, hereby stipulate and agree to 18 extend the deadline for Allied World to file a responsive pleading to Plaintiff's Complaint by 19 fourteen (14) days, from January 23, 2020 to February 6, 2020. 20 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the 21 requested extension, as counsel for Allied World has only recently been retained in this matter is in 22 the process of obtaining and reviewing the relevant file materials and information necessary to 23 respond to the allegations set forth in the Complaint. Accordingly, the parties agree that the 24 requested extension furthers the interests of this litigation and is not being requested in bad faith or 25 to delay these proceedings unnecessarily. 26 /// 27 /// 28

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1	This is the parties' first request for extension of the deadline.
2	DATED this 22nd day of January, 2020.
3	WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP
4	
5	/s/ Chad C. Butterfield CHAD C. BUTTERFIELD
	Nevada Bar No. 10532
6	300 South Fourth Street, 11 th Floor Las Vegas, NV 89101
7	Attorneys for Defendant Allied World
8	Insurance Company
	DATED this 22nd day of January, 2020.
9	PRINCE LAW GROUP
10	/s/ Kevin Strong
11	DENNIS M. PRINCE
12	Nevada Bar No. 5092
12	KEVIN T. STRONG Nevada Bar No. 12107
13	JONATHAN A. RICH
14	Nevada Bar No. 15312
17	10801 West Charleston Blvd.
15	Las Vegas, NV 89135
16	Attorney for Plaintiff Joyce Sirianni
17	
18	
19	ORDER
20	GOOD CAUSE SHOWN, IT IS SO ORDERED.
21	
22	Dated this 23rd day of January, 2020.
23	
24	Clauma I. Zouchah
25	UNITED STATES MAGISTRATE JUDGE
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